SUPREME COURT, U. S.
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In the Supreme Court of the United States

OCTOBER TERM, 1974

ROBERT BRADLEY JONES, HILDA STUBBINGS, SIDNEY FREEMAN, LLOYD SMITH, and MARY LOU IRVING, members of TAXPAYERS' INVESTIGATIONAL COMMITTEE OF OREGON, an unincorporated association,

Petitioners,

v.

GEORGE P. SCHULTZ, now by succession, WILLIAM E. SIMON, Secretary of the Treasury of the United States, and ROGERS C. B. MORTON, Secretary of the Interior of the United States,

Respondents.

MOTION FOR LEAVE TO FILE A BRIEF AMICUS CURIAE IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI

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Oregon Homeowners Association

STEVENS-NESS LAW PUB. CO., PORTLAND, ORE. 12-74

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The OREGON HOMEOWNERS ASSOCIATION, by JOHN WINKLER, its attorney, applies for permission of the court to file an amicus curiae brief in support of the Petition for Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit on file herein.

The supporting brief accompanies this motion.

Your applicant respectfully represents to the court the following:

1. Your applicant is a voluntary association of real property owners in the State of Oregon. The name of the association is the OREGON HOMEOWNERS ASSOCIATION and is made up of 3,300 members. This Association has been in existence for over 10 years and has concerned itself with the problems and interests of the homeowners as to county assessments and to take public stands that will bring an equitable assessment of county budgets for our members and all homeowners of the State of Oregon.

The OREGON HOMEOWNERS ASSOCIATION, through its members, has made in depth studies of the entire problem of real property taxation.

The particular issues involved in the Petition for Writ of Certiorari are important to your applicant. The OREGON HOMEOWNERS ASSOCIATION is seeking equitable answers to the real property taxation problem. When the McNary Act provides a formula for distribution of timber sales from Oregon timber and the 18 O&C counties fail to seek its enforcement, we are extremely concerned.

The proper distribution of the O&C funds would go a long way to ease the tax burden on real property.

The petitioners, in our judgment, have a sound and logical position that should be seriously considered.

In our belief, their position is founded on the his-

torical sequence of events that lead to the conclusion that:

(1) Oregon has a vested and beneficial interest in these lands.

(2) The formula of the McNary Act should be adhered to in distribution of the O&C funds.

The OREGON HOMEOWNERS ASSOCIATION is vitally concerned with this monumental issue and sincerely believes that because of its background, it can assist the court in a proper determination of the matter.

Dated this ..... day of December, 1974.

JOHN M. WINKLER,
Attorney for Amicus Curiae,
OREGON HOMEOWNERS ASSOCIATION
1500 S. W. First Avenue
Portland, Oregon 97201